

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE: PRIME ENERGY CONSUMER
LITIGATION**

Case No. 1:24-cv-02657

This document relates to:

All actions.

**PLAINTIFFS' NOTICE OF MOTION TO APPOINT
INTERIM CO-LEAD COUNSEL AND TO SET A SCHEDULE
FOR THE FILING OF CONSOLIDATED COMPLAINT**

PLEASE TAKE NOTICE that, upon the Plaintiffs' accompanying Memorandum of Law in Support of Their Motion to Appoint Interim Co-Lead Counsel and to Set a Schedule for the Filing of Consolidated Complaint, the Declaration of Kirsten Lake Cardoso, dated July 26, 2024, and the exhibit thereto, the Declaration of Paul Doolittle, dated July 26, 2024, and all pleadings and proceedings had herein, Plaintiffs Lara Vera, Jemirria Thompson, and Bryant Preudhomme (together, "Plaintiffs") will move this Court, before the Honorable Katherine Polk Failla, United States District Judge, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 618, New York, New York 10007, at a date and time to be determined by the Court, for an Order under Rule 23(g)(3) of the Federal Rules of Civil Procedure appointing: (1) Kristen Lake Cardoso of Kopelowitz Ostrow Ferguson Weiselberg Gilbert; and (2) Paul Doolittle of Poulin Willey Anastopoulo as interim co-lead counsel. Plaintiffs will also move this Court for an order setting a schedule for Plaintiffs to file a Consolidated Complaint within 30 days of an order appointing interim co-lead counsel.

Pursuant to Federal Rule of Civil Procedure 23(g)(3) and the Court's June 24, 2024 Order (Dkt. #13), Plaintiffs Lara Vera, Jemirria Thompson, and Bryant Preudhomme (collectively,

“Plaintiffs”) respectfully request that the Court appoint Kristen Lake Cardoso and Paul Doolittle as interim co-lead counsel (“Proposed Interim Co-Lead Counsel”), to lead this litigation on behalf of the putative class. Proposed Interim Co-Lead Counsel have significant nationwide consumer class action experience, knowledge of the applicable law, and substantial resources that can be used to litigate this matter. Further, Plaintiffs request a schedule to file a consolidated complaint 30 days after appointment of interim co-lead counsel.

Dated: July 26, 2024

Respectfully Submitted,

/s/ Mason Barney

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**pro hac vice forthcoming*